

TABLE OF CONTENTS

Introduction	1
Background	3
a. Hizbollah and LCB	3
b. The Licci/Kaplan Action Against LCB	9
c. SGBL Assumes LCB’s Liability to Victims of the Hizbollah Rocket Attacks	15
Argument	18
A. This Court Has Personal Jurisdiction Over the SGBL	18
i. The Traditional Common Law Test	19
ii. The Substantial Continuity Test	20
B. Alternatively, the Court Should Permit Jurisdictional Discovery	30
C. The New Plaintiffs Are Not Estopped by the Decision in <i>Kaplan v. LCB</i>	31
D. The FAC States a Claim for Liability Under the ATA	35
a. The FAC States a Claim for Secondary Liability	35
1. The FAC Sufficiently Alleges That LCB Aided, Abetted and Conspired With “the person who committed” the Rocket Attacks	35
2. The FAC States a Claim for Aiding and Abetting	38
3. The FAC States a Claim for Conspiracy	43
b. The FAC States a Claim for Primary Liability	44
Conclusion	46